

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***RESPONSE TO COMMENTS***

ON THE TITLE V DRAFT PERMIT: V-07-004

Roll Coater, Inc.

Hawesville, KY 42348

Date: October 31, 2007

Sajjad Quabili, Reviewer

SOURCE ID:	21-091-00020
SOURCE A.I. #:	1619
ACTIVITY ID:	APE20040003

**SOURCE DESCRIPTION:**

Roll Coater operates a metal coil manufacturing plant at Hawesville. The coil coating operation includes prime coating, finish coating and drying ovens. Permanent Total Enclosure (PTE) combined with a thermal oxidizer is utilized to capture and control the VOC/HAP emissions released from the roll coating process.

**PUBLIC AND U.S. EPA REVIEW:**

On September 20, 2006, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The Hancock Clarion* in Hawesville, Kentucky. The public comment period expired 30 days from the date of publication.

Comments were received from Roll Coater Inc on October 22, 2007. Attachment A to this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. Please see Attachment A for a detailed explanation of the changes made to the permit. The U.S. EPA has 45 days to comment on this proposed permit.

# ATTACHMENT A

## Response to Comments

Comments on Roll Coater's Hawesville coating operation Draft Title V Air Quality Permit submitted by Anthony Kunkler, Environmental Manager.

### **Permit Application Summary Form**

1. Permit Application Summary Form, page 5 of 5: The first sentence of the first paragraph of the page indicates that the Division is requiring Roll Coater to keep daily records of usage of coatings and thinners and to summarize those records at the end of each month. However, the permit does not state a requirement to keep daily records. Because calculations will be on a monthly basis, Roll Coater proposes to keep monthly records of usage. Roll Coater requests that the sentence be changed to read as follows: "The Division is requiring Roll Coater, Inc. to keep monthly records of usage of coatings and thinners at the metal coil coating line."

*Division's response: The Division has revised the Summary Form as requested by the source.*

### **Title V Permit**

2. Permit Cover Page: The revision date in the lower left hand corner of the permit cover page does not appear to have been appropriately updated. Roll Coater requests that it be updated in the final permit issued.

*Division's response: The Division has revised the permit as requested by the source.*

3. Permit Table of Contents: In the table following the Table of Contents, please change the Complete Date for V-07-004 from "3/2//2005" to "3/2/2005".

*Division's response: The Division has revised the permit as requested by the source.*

4. Permit Section B, subsection 3. Testing Requirements, paragraph (b)(1), page 5 of 41: Please delete the phrase "or (3)" from the end of paragraph (b)(1)., so that it reads as follows: "The permittee shall use the following procedures for each affected facility that continuously uses a capture system and a thermal oxidizer to comply with the emission limit specified in the Section 2(b)(1) or (2)." This change is requested so that the requirements of the permit properly reflect the requirements stated in §60.462 and §60.463(c)(2) of 40 CFR Part 60.

*Division's response: The Division concurs with the comment and has revised the permit as suggested by the source.*

5. Permit Section B, subsection 3. Testing Requirements, paragraph (b)(3), page 7 of 41: Please add "(3)" to the end of paragraph (b)(3), so that it reads as follows: "The permittee shall use the following procedures for each affected facility that intermittently uses a capture

system and a control device to comply with the emission limit specified in the Section 2(b)(3).” This change is requested so that the requirements of the permit properly reflect the requirements stated in §60.462 and §60.463(c)(4) of 40 CFR Part 60.

6. Permit Section B, Equation 7, page 8 of 41: Please correct the second summation in the equation to indicate that it is from “ $j = 1$ ” to “ $m$ ”, rather than from “ $j =$ ” to “ $m$ ”.

*Division’s response: The Division concurs with the comment and has revised the permit as suggested by the source.*

7. Permit Section B, Equation 9, page 9 of 41: Please correct the first summation in the equation to indicate that it is from “ $i = 1$ ” to “ $n$ ”, rather than from “ $i =$ ” to “ $n$ ”.

*Division’s response: The Division concurs with the comment and has revised the permit as suggested by the source.*

8. Permit Section B, subsection 4. Specific Monitoring Requirements, paragraph (a), page 10 of 41: Please change the paragraph so that it reads as follows: “Where compliance with the numerical limit specified in the Section 2(b)(1) is achieved through the use of VOC-content coatings in conjunction with emission control devices...”. This change is requested so that the requirements of the permit properly reflect the requirements stated in §60.464(a) of 40 CFR Part 60.

*Division’s response: The Division concurs with the comment and has revised the permit as suggested by the source.*

9. Permit Section B, subsection 4. Specific Monitoring Requirements, paragraph (b), page 10 of 41: Please change the paragraph so that it reads as follows: “Where compliance with the limit specified in the Section 2(b)(3) is achieved through the intermittent use of emission control devices...”. This change is requested so that the requirements of the permit properly reflect the requirements stated in §60.464(b) of 40 CFR Part 60.

*Division’s response: The Division concurs with the comment and has revised the permit as suggested by the source.*

10. Permit Section B, subsection 2. Emission Limitations, paragraph (a), page 13 of 41: Please change the word “paragraph” to the word “paragraphs” to reflect the presence of two following paragraphs.

*Division’s response: The Division concurs with the comment and has revised the permit as suggested by the source.*

11. Permit Section B, subsection 3. Testing/Compliance Demonstration Requirements, paragraph (a), subparagraph (1), Roman numeral (v), page 14 of 41: Please add the word “section” to the end of the paragraph at Roman numeral (v). This change is necessary to properly reflect the requirements of 40 CFR Part 63 §63.5160(d)(1)(v).

*Division's response: The Division concurs with the comment and has revised the permit as suggested by the source.*

12. Permit Section B, subsection 3. Testing/Compliance Demonstration Requirements, paragraph (a), subparagraph (1), Roman numeral (vi), page 14 of 41: Please revise the formatting to reflect the formatting utilized in the rest of the subsection.

*Division's response: The Division concurs with the comment and has revised the permit as suggested by the source.*

13. Permit Section B, subsection 3. Testing/Compliance Demonstration Requirements, subparagraph (1), Roman numeral (x), page 18 of 41: Please change the paragraph at Roman numeral (x) so that it references "Equation 5", rather than "Equation 6". This change is necessary to properly reflect the requirements of 40 CFR Part 63 §63.5170(f)(1)(x) under the equation naming convention used in this permit.

*Division's response: The Division concurs with the comment and has revised the permit as suggested by the source.*

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.